

CORNERSTONE

Environmental Group, LLC

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VIA E-MAIL AND US MAIL

January 6, 2012

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

RECEIVED
JAN 10 2012

Subject: Monthly Progress Report for December 2011
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Work on the preparation of the FS report was completed and a draft FS report was submitted to the USEPA.
- Work on the revised draft final RI report to incorporate the off-site ditch investigation was completed and the report was submitted to the USEPA.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated December 2, 2011, including an updated project schedule of the same date.

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- Revised Draft Remedial Investigation Report dated December 2011, incorporating the results of the investigation of off-site ditches, submitted to the USEPA on December 6, 2011.
- Draft Feasibility Study report dated December 2011, submitted to the USEPA on December 12, 2011.

C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period.

E. Other pertinent communications with the agencies during the previous month:

- None during the reporting period.

2. Future Actions, Data, and Plans

A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months:

- Continue work on resolving comments from the USEPA on the *Draft Remedial Investigation Report* submitted by IES (awaiting response from the USEPA).
- Continue work on resolving comments from the USEPA on the *Draft Baseline Ecological Risk Assessment* submitted by IES (awaiting response from the USEPA).
- Address comments from the USEPA on the revised *Draft Remedial Investigation Report* that incorporated the results of the investigation of off-site ditches (contingent on receipt of comments).
- Address comments from the USEPA on the *Draft Feasibility Study* report (contingent on receipt of comments).

B. Other information related to the progress of work:

- None during this reporting period.

3. Project Schedule

A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the

submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process.

B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- No specific delays are being encountered at this time, and the current schedule reflects the completion of draft RI and FS reports, as described above. However, responses are still pending from the USEPA on the remaining comments on the RI and the ecological risk assessment.

C. Description of efforts made to mitigate these delays or anticipated delays:

- None necessary at this time.

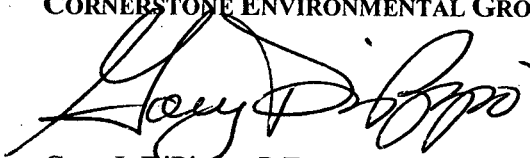
4. Funding Mechanism

A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact David McNichol of IES at 973-628-3355.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC



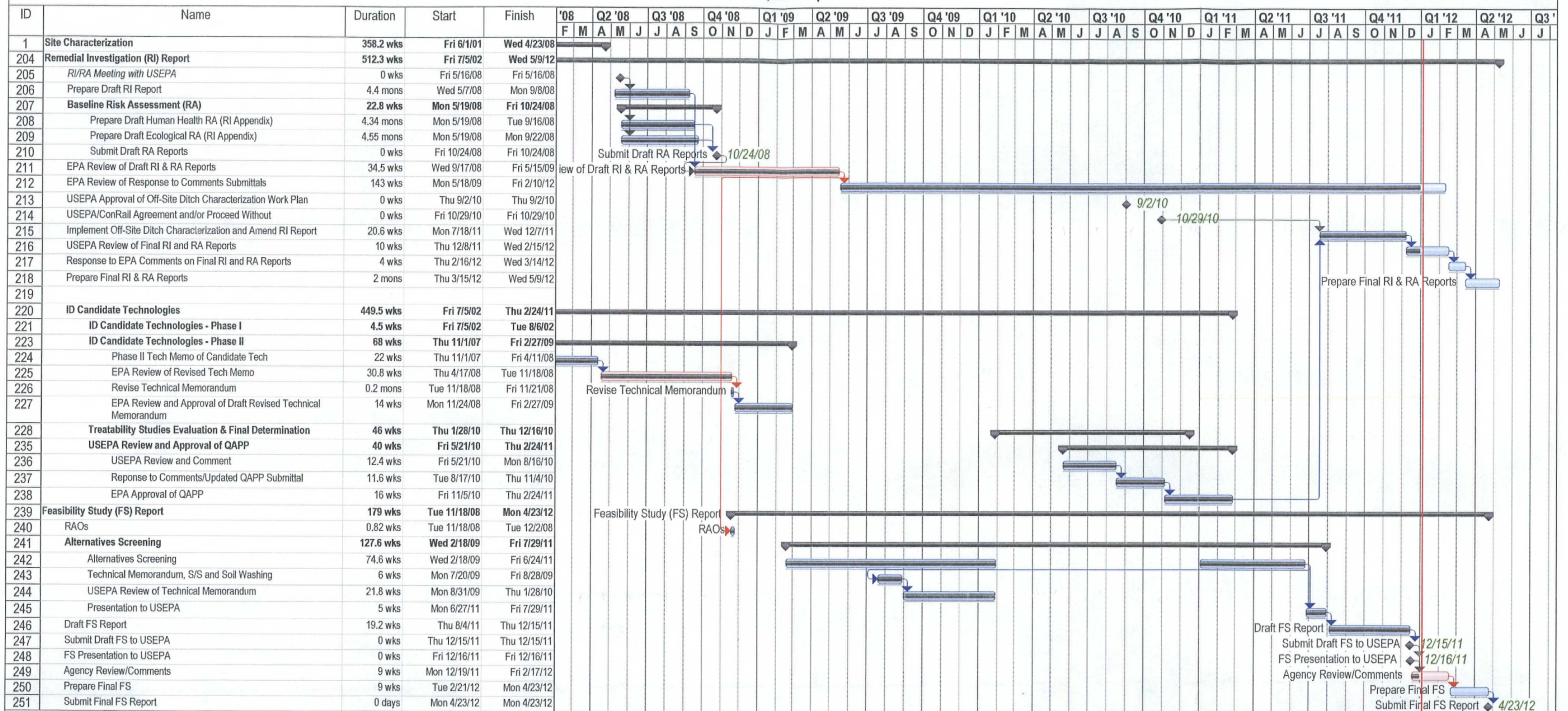
Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: S. Miller, NJDHSS
F. Cardiello, Esq., USEPA
D. McNichol, IES
D. Toft, Esq.
G. Zervas, NJDEP

C. McGowan, IES
S. MacMillin, Brown and Caldwell
K. Tolson, Geosyntec
M. DeFlaun, Geosyntec
J. Kubitz, Entrix

Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site



Task Progress Milestone Summary